

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

WALTER N. KOSCH, WALTER T. KOSCH, and )  
THE SONNENSCHNEIDER GROUPE, a defacto )  
limited liability company, )

Plaintiffs,

v.

FFIC/BEAM, INCORPORATED, a Philippine )  
corporation, FFIC/BEAM, INC. NEW JERSEY, )  
FFIC/BEAM WASHINGTON, THE BOARD OF )  
DIRECTORS OF FFIC/BEAM, INCORPORATED )  
consisting of ROBERT FIELDS, Managing Director, )  
REYNALDO SANTOS, PRIMROSE E. AUTAJAY, )  
RELU E. AUTAJAU, SOLEDAD O. HERNAEZ, )  
JOSEFA T. DORAN, VICENTE A. CALIJO, )  
STELLA V. CALIBJO, JOHN NG, PAUL D. )  
CHAFIOTTE, EDWARD J. VILLANUEVA, )  
ROBERT FIELDS, an individual, )  
KARL NEUBACHER an individual, TIMOTHY )  
SLIFKIN, an individual, ALLIED MORTGAGE )  
GROUP, a corporation, METROPOLITAN )  
FINANCIAL SERVICES, INC., a corporation and )  
AARON RANSOM, an individual, )

Defendants.

Case No. 08 cv 0750

Judge Manning

Magistrate Judge Mason

**DEFENDANT ALLIED MORTGAGE GROUP, INC.'S AGREED MOTION  
FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant, Allied Mortgage Group, Inc. ("Allied"), by its attorneys, and without objection from Plaintiffs, requests this Court to extend the time in which Allied has to answer or otherwise plead to Plaintiffs' Complaint, to and including March 12, 2008. In support of this Motion, Allied states as follows:

1. On December 19, 2007, Plaintiffs filed a Complaint against Allied and the other defendants in the above-captioned action in the Circuit Court of Cook County, Illinois, alleging claims for breach of contract (Count I), fraudulent misrepresentation (Count II), constructive fraud (Count III), tortious interference with prospective economic advantage (Count IV), civil

conspiracy (Count V), and violation of the Racketeering Influence Corrupt Organization Act (Count VI ).

2. On January 3, 2008, Allied was served with a summons and a copy of the Complaint.

3. On February 4, 2008, Allied timely filed a Notice of Removal of this action to this Court. As of the date of removal, no other defendant had been served.

4. Pursuant to Federal Rule of Civil Procedure 81(c), Allied's answer or other responsive pleading to the Complaint is due to be filed on or before February 11, 2008.

5. Allied's counsel was only recently retained to represent Allied in this action and, therefore, has not had sufficient time to investigate the allegations and legal claims contained in Plaintiffs' Complaint. Accordingly, Allied seeks additional time to file an answer or otherwise plead to Plaintiffs' Complaint, to and including March 12, 2008.

6. Allied's counsel has contacted counsel for Plaintiffs, and Plaintiffs have no objection to Allied's requested extension.

7. Allied is filing this Motion in good faith and not for the purpose of delay.

WHEREFORE, Defendant Allied Mortgage Group, Inc., without objection from Plaintiffs, requests this Court to extend the time in which it has to answer or otherwise plead to Plaintiffs' Complaint, to and including March 12, 2008.

ALLIED MORTGAGE GROUP, INC.

By: /s/ Jeffrey D. Pilgrim  
One of its Attorneys

Michael R. Turoff  
Jeffrey D. Pilgrim  
Arnstein & Lehr LLP  
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Suite 1200  
Chicago, IL 60606  
(312) 876-7100

**CERTIFICATE OF SERVICE**

Jeffrey D. Pilgrim, an attorney, certifies that on February 8, 2008, he electronically filed the foregoing **Defendant Allied Mortgage Group, Inc.'s Agreed Motion** for Extension of Time to Answer or Otherwise Plead with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to the following:

Michael Lee Tinaglia, [mltinaglia@tinagliaw.com](mailto:mltinaglia@tinagliaw.com)

Theodore John Low, [tjl@willmot.com](mailto:tjl@willmot.com)

C. Barry Montgomery, [cbm@willmont.com](mailto:cbm@willmont.com)

/s Jeffrey D. Pilgrim